

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

JOSE S. GARZA
Plaintiff

v.

NATIONAL OILWELL VARCO, L.P.
Defendant

Civil Action No. 4:12-cv-03532
Judge Nancy F. Atlas

WITNESS LIST OF DEFENDANT NATIONAL OILWELL VARCO, L.P.

Defendant National Oilwell Varco, L.P., (hereinafter "Defendant" or "NOV") hereby submits its Witness List, stating as follows:

MAY CALL

1. Jose Garza

Subject of Information: Mr. Garza is expected to testify regarding his claims against NOV.

2. William Goff, Sr.

Subject of Information: Mr. Goff is expected to testify about facts supporting NOV's defenses.

3. Rudy Lopez
11919 FM 529
Houston, Texas 77041

Subject of Information: Mr. Lopez is expected to testify about facts supporting NOV's defenses.

4. Bill Butler
6390 N. Eldridge Pkwy.
Houston, Texas 77041

Subject of Information: Mr. Butler is expected to testify about facts supporting NOV's defenses and consistent with his deposition testimony.

5. Jack Landis
11919 FM 529
Houston, Texas 77041

Subject of Information: Mr. Landis is expected to testify about facts supporting NOV's defenses, including facts surrounding the termination of Plaintiff's employment, and consistent with his deposition testimony.

6. Kevin Warren

Subject of Information: Mr. Warren is expected to testify about facts supporting NOV's defenses, including facts surrounding the termination of Plaintiff's employment.

7. Meredith Black Bruce
10000 Richmond Avenue
Houston, TX 77042

Subject of Information: Ms. Bruce is expected to testify about facts supporting NOV's defenses, including her investigation into Plaintiff's claims in April/May 2009, and consistent with her deposition testimony.

8. Bob Miller

Mr. Miller is expected to testify about facts supporting NOV's defenses, Plaintiff's employment, and consistent with his deposition testimony.

9. James Posada

Mr. Posada may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

10. Steven Hunt

Mr. Hunt may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

11. Enrique Castellanos

Mr. Castellanos may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

12. Anirban Banerjee

Mr. Banerjee may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

13. Jeff Dodd
10000 Richmond Avenue
Houston, TX 77042

Mr. Dodd may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

14. Miguel Gutierrez
11919 FM 529
Houston, Texas 77041

Mr. Gutierrez may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

15. Lon Allchin
10000 Richmond Avenue
Houston, TX 77042

Mr. Allchin may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

16. Richard Urquhart

Mr. Urquhart may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

17. Alfredo Amaya

Mr. Amaya may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

18. Marco Calderon
11919 FM 529
Houston, Texas 77041

Mr. Calderon may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

19. Jose Roberto Lanzas
11919 FM 529
Houston, Texas 77041

Mr. Lanzas may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

20. Jose Amancio Martinez

Mr. Martinez may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

21. Luis Rodriguez
11919 FM 529
Houston, Texas 77041

Mr. Rodriguez may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

22. Freddy Rubiano
11919 FM 529
Houston, Texas 77041

Mr. Rubiano may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

23. Richard Tellez

Mr. Tellez may testify regarding facts related to Plaintiff's claims or Defendant's defenses.

24. Julissa Barrios

Ms. Barrios may testify regarding facts related to Plaintiff's claims.

Respectfully submitted,

/s/ Christopher E. Moore

Christopher E. Moore, Esq.
(Attorney-in-Charge)
TX State Bar No. 24052778
SDTX Admission No. 713063
Christine M. White, Esq.
Texas Bar No. 24068713
SDTX Admission No. 712655
Jennifer L. Englander, Esq.
LA State Bar No. 29572
SDTX Admission No. 1430436
Ogletree, Deakins, Nash, Smoak
& Stewart, P.C.
One Shell Square
701 Poydras St., Suite 3500
New Orleans, LA 70139
Telephone: (504) 648-3840
Facsimile: (504) 648-3859
Electronic Mail:
christopher.moore@ogletreedeakins.com
christine.white@ogletreedeakins.com
jennifer.englander@ogletreedeakins.com

Attorneys for Defendant
National Oilwell Varco, L.P.

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing Defendant's Witness List has been served on the following counsel of record via the Court's Electronic Filing/Notification System:

Peter Costea, Esq.
Three Riverway, Suite 1800
Houston, Texas 77056
Telephone: (713) 337-3304
Facsimile: (713) 659-5302
Electronic mail: costealaw@yahoo.com

This 11th day of July, 2014.

/s/ Christopher E. Moore

17079450.1